

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK


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	:	
UNITED STATES OF AMERICA,	:	
	:	
-v-	:	23-CR-367 (JMF)
	:	
OLUSEUN MARTINS OMOLE,	:	<u>ORDER</u>
	:	
Defendant.	:	
-----	X	

JESSE M. FURMAN, United States District Judge:

On December 27, 2024, the Court received the attached “THIRD PARTY PETITION FOR A HEARING TO ADJUDICATE THE INTEREST IN FBI ITEMS 1B77 TO 1B93” via email. The Government shall file a response to the Petition **within two weeks**.

SO ORDERED.

Dated: January 7, 2025  
New York, New York

  
\_\_\_\_\_  
JESSE M. FURMAN  
United States District Judge

Ronald Olajide  
4200 Park Blvd Apt. 137  
Oakland, CA 94602  
510-629-0238  
Attorney for Plaintiff: Self-Represented

RE: Case # 23-CR-367 (JMF), Document 43 p.7 paragraph 7  
Honorable Jesse M. Furman  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

To the Honorable Judge of the  
District Court of the United States of America  
for the Southern District of New York

RONALD OLAJIDE  
PETITIONER  
UNITED STATES OF AMERICA  
THIRD PARTY RESPONDENT  
V.  
OLUSEUN MARTINS OMOLE,  
THIRD PARTY RESPONDENT

THIRD PARTY PETITION FOR A HEARING  
TO ADJUDICATE THE INTEREST IN FBI  
ITEMS 1B77 TO 1B93

23 CR. 367 (JMF)

1 WHEREAS, pursuant to this court's "CONSENT PRELIMINARY ORDER OF FORFEITURE AS  
2 TO SPECIFIC PROPERTY/ MONEY JUDGMENT", Ronald Olajide, by his own right pleads to the  
3 court pursuant to 21 U.S. Code § 853n for a hearing to adjudicate the validity of his interest in the  
4 FBI items 1B77 to 1B93 as a Bona fide purchaser for value with a vested ownership interest therein.  
5

- 6  
7 **1.** Petitioner used his Bank of America Business credit card, issued in his business name  
8 SUNSHINE INVESTMENT COMPANY, ending in 9722 to Purchase items from  
9 ECOFLOW and AMAZON.COM that include those mentioned as FBI items 1B77 to  
10 1B93. Proof of his purchases are attached to this Petition via receipts and corresponding  
11 Bank statements evidencing transactions of his purchases dated November 30, 2022 for  
12 \$7,079.80, December 7, 2022 for \$3,205.72, December 09, 2022 for \$8,941.13 and  
13 December 15, 2022 for \$4,705.86.  
14
- 15 **2.** Petitioner used his Bank of America Business debit card issued in his business name  
16 SUNSHINE INVESTMENT COMPANY ending in 0845 to Purchase items from  
17 AMAZON.COM that include those mentioned as FBI items 1B77 to 1B93. Proof of his  
18 purchases are attached to this Petition via receipts and corresponding Bank statements  
19 evidencing transactions of his purchases dated December 1, 2022 for \$6,095.26.  
20
- 21 **3.** It was my intent to use the solar equipment in Nigeria to provide electric power to a rural  
22 site that I wanted to do non-profit work at to fight poverty.  
23
- 24 **4.** I failed several times to procure a freight carrier that was willing to transport my solar  
25 equipment to Nigeria, most said that federal regulations prohibited such transport via  
26 airplane, so the only other option I had was to ship the equipment.  
27  
28

- 1       **5.** An interior designer that I contracted to do work for me in Nigeria referred me to  
2       OLUSEUN MARTINS OMOLE in December 2022, he claimed that OMOLE was a  
3       reputable freight shipper that could transport my purchased property. Prior to this time  
4       Petitioner never knew, OMOLE in any form, Petitioner wasn't involved in any criminal  
5       activity nor was he aware of any criminal activity that OMOLE has been accused of.  
6
- 7       **6.** On January 27, 2023, Petitioner used his Bank of America Business credit card, issued in  
8       his business name SUNSHINE INVESTMENT COMPANY, ending in 9722 to Purchase  
9       freight services valued at \$3,545, in which OLUSEUN MARTINS OMOLE undertook an  
10      obligation through his business named TOBYLINK IMPRESSIONS to deliver my  
11      purchased items to me in Nigeria, a copy of said receipt and invoice is attached to this  
12      Petition as an exhibit.  
13
- 14      **7.** The invoice was made by OLUSEUN MARTINS OMOLE on January 27, 2023, after he  
15      received my purchased items. The invoice confirms OMOLE received a total of 21 boxes  
16      containing solar equipment that he was to ship to me in Ikoyi, Lagos, Nigeria.  
17
- 18      **8.** No evidence on the record of this case and its associated case # 23-mj-01796 exists to  
19      prove that exigent circumstances existed or a warrant was issued as required by  
20      Amendment 4 of the U.S. Constitution, before OLUSEUN MARTINS OMOLE and my  
21      purchased items were seized by Special Agent of the Federal Bureau of Investigation's  
22      Mary Boothe from a private property located at 10111 Clodine Road, Richmond, Texas  
23      77407, nor does any evidence on the record exist to prove that a probable cause  
24      determination was made by a magistrate judge after OLUSEUN MARTINS OMOLE and  
25      my purchased property were seized.  
26  
27  
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- 1           **9.** Prior to the FBI's seizure, I had no reason to believe my property was involved in any  
2           unlawful activity. My reasonable expectation of privacy under procedural protections of  
3           the 4<sup>th</sup> Amendment was violated.
- 4           **10.** Mary Boothe, the FBI and Attorney General have exercised and shown authority under  
5           28 U.S. Code Section 533 and 18 U.S. Code Section 3052 to seize my purchased  
6           property without a warrant, but no statutory or Judicial law has expressly authorized the  
7           seizure of my property contrarily to procedural requirements of the 4<sup>th</sup> Amendment.
- 8           **11.** Any reasonable public servant should know that to seize a person's property without  
9           exigent circumstances or following clearly established procedures of the 4th Amendment  
10           would be outside of their subject matter jurisdiction and violate my rights thereunder.
- 11           **12.** On December 14, 2024 I Discovered this court's "Consent Preliminary Order of  
12           Forfeiture as to Specific Property/ Money Judgment" (Doc.43). I looked on  
13           [www.forfeiture.gov](http://www.forfeiture.gov) to see if the United States had published a forfeiture notice as this  
14           court ordered it to in Doc.43, p.7 for at least thirty (30) consecutive days, but none had  
15           been published as of date.
- 16           **13.** Despite receiving a copy of my receipts to prove my ownership interest in FBI items  
17           1B77 to 1B93 via email I sent to [Tobylinkfraudvictims@fbi.gov](mailto:Tobylinkfraudvictims@fbi.gov) on June 11, 2024, the  
18           United States refused to send me notice pursuant to this court's order in in Doc.43, p.8 to  
19           contest the forfeiture in a ancillary proceeding.
- 20           **14.** No evidence on the record exist to prove that Omole or the United States has a property  
21           interest in FBI items 1B77 to 1B93 that is superior to mine.
- 22           **15.** The following documents are hereby incorporated to this Petition as supporting evidence  
23           of my claims.
- 24  
25  
26  
27  
28



SUNSHINE INVESTMENT  
 3398  
 November 18, 2022 - December 17, 2022  
 Page 3 of 6

### Transactions

Posting Date	Transaction Date	Description	Reference Number	Amount
<b>SUNSHINE INVESTMENT</b>				
<b>Account Number: 3398</b>				
<b>Payments and Other Credits</b>				
11/21	11/16			
11/30	11/28			
12/05	11/28			
<b>TOTAL PAYMENTS AND OTHER CREDITS FOR THIS PERIOD</b>				<b>\$10,000.00</b>
<b>OLAJIDE, RONALD</b>				
<b>Account Number: 9722</b>				
<b>Payments and Other Credits</b>				
11/22	11/22			
11/28	11/25			
11/28	11/27			
12/05	12/03			
12/08	12/08			
12/12	12/09			
<b>TOTAL PAYMENTS AND OTHER CREDITS FOR THIS PERIOD</b>				<b>-\$37,753.53</b>
<b>Purchases and Other Charges</b>				
11/18	11/18			
11/21	11/18			
11/21	11/19			
11/21	11/20			
11/21	11/21			
11/21	11/21			
11/22	11/20			
11/25	11/24			
11/25	11/24			
11/25	11/24			
11/28	11/25			
11/28	11/25			
11/28	11/26			
11/28	11/26			
11/29	11/28			
11/29	11/29			
11/30	11/29			
11/30	11/30			
11/30	11/29			
12/01	11/30			
12/01	11/30	SP ECOFLOW TECH DOVER DE	82711162335000002181347	7,079.80
12/01	11/30			
12/02	12/01			
12/02	12/01			
12/02	12/02			
12/05	12/02			
12/05	12/03			
12/05	12/04			
12/05	12/04			
12/05	12/04			
12/05	12/04			
12/05	12/05			
12/06	12/05			
12/06	12/05			
12/06	12/06			

**Order No. #71666**

November 27, 2022

**Items ordered**

EcoFlow Solar to  
XT60/XT60i  
Charging Cable  
XT60 (3.5m)

x 1 \$24.99



EcoFlow DELTA Pro  
to Smart Generator  
Adapter

x 1 \$69.00

EcoFlow 400W x 1 \$899.00

EcoFlow DELTA Pro +  
Double Voltage Hub -  
2\*EcoFlow DELTA Pro +  
Double Voltage Hub

EcoFlow DELTA  
Pro + Double  
Voltage Hub  
2\*EcoFlow DELTA  
Pro + Double  
Voltage Hub

x 1 \$6,199.00

Discount (HOBOTECHBF8) -\$575.35

Subtotal \$6,616.64

Miami Dade County Tax (1.0%) \$66.16

Florida State Tax (6.0%) \$397.00

**Total \$7,079.80**

**Payment Info**

Mastercard [REDACTED] 07/22]

\$7,079.80

**Shipping Address**

casey green  
400 kings point drive  
230  
sunny isles beach, FL 33160  
United States  
Tel. (786) 233-9074

**Customer**

SUNSHINE INVESTMENT  
3479 NE 163RD ST  
115  
NORTH MIAMI BEACH, FL 33160  
United States  
Tel. (510) 629-0238



SUNSHINE INVESTMENT  
 3398  
 November 18, 2022 - December 17, 2022  
 Page 4 of 6

### Transactions

Posting Date	Transaction Date	Description	Reference Number	Amount
12/06	12/05			
12/07	12/06			
12/07	12/06			
12/07	12/06			
12/08	12/07	AMZN MKTP US*XY0JR4Z63 AMZN.COM/BILLWA	55310202341083357109649	3,205.72
12/08	12/07			
12/08	12/07			
12/09	12/08			
12/09	12/09			
12/09	12/08			
12/12	12/09			
12/12	12/09	SP ECOFLOW TECH DOVER DE	82711162343000011199793	8,941.13
12/12	12/09			
12/12	12/10			
12/12	12/11			
12/12	12/11			
12/12	12/12			
12/12	12/11			
12/13	12/12			
12/13	12/12			
12/13	12/13			
12/14	12/14			
12/15	12/14			
12/16	12/15			
12/16	12/15			
12/16	12/15			
12/16	12/15			

TOTAL PURCHASES AND OTHER CHARGES FOR THIS PERIOD

### Finance Charge Calculation

Your Annual Percentage Rate (APR) is the annual interest rate on your account.

	Annual Percentage Rate	Balance Subject to Interest Rate	Finance Charges by Transaction Type
PURCHASES	25.99% V	\$0.00	\$0.00
CASH	27.99% V	\$0.00	\$0.00

V = Variable Rate (rate may vary), Promotional Balance = APR for limited time on specified transactions.

### Reward Summary

Beginning Balance	758.93	Other Bonuses	.00
Earned	464.80	Preferred Rewards for Business Bonus	348.66
Redeemed	.00		
Adjustments	.00	Ending Balance	1,572.39

To redeem your Cash Rewards call 1.800.673.1044, or visit [www.bankofamerica.com](http://www.bankofamerica.com)





**Order No. EFUS-74185**

December 09, 2022

**Items ordered****EcoFlow****DELTA****Pro****Smart****Extra****Battery**

EcoFlow DELTA Pro Smart Extra	x 4	\$8,796.00
Battery		

Discount (FIJA24JE)	-\$439.80
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Subtotal	\$8,356.20
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Florida State Tax (6.0%)	\$501.37
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Miami Dade County Tax (1.0%)	\$83.56
------------------------------	---------

<b>Total</b>	<b>\$8,941.13</b>
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**Payment Info**

Mastercard (.....9722)

\$8,941.13

**Shipping Address**

casey green

400 Kings point dr

230

sunny isles beach, FL 33160

United States

Tel. (786) 233-9074

**Customer**

SUNSHINE INVESTMENT

3479 NE 163RD ST

115

NORTH MIAMI BEACH, FL 33160

United States

Tel. 5106290238



SUNSHINE INVESTMENT  
 3398  
 December 18, 2022 - January 17, 2023  
 Page 3 of 6

### Transactions

Posting Date	Transaction Date	Description	Reference Number	Amount
<b>SUNSHINE INVESTMENT</b>				
<b>Account Number: 3398</b>				

<b>Payments and Other Credits</b>				
12/20	12/17			
12/23	12/17			
12/29	12/29			
01/12	12/29			
01/13	01/13			
<b>TOTAL PAYMENTS AND OTHER CREDITS FOR THIS PERIOD</b>				

<b>OLAJIDE, RONALD</b>				
<b>Account Number: 9722</b>				

<b>Payments and Other Credits</b>				
12/19	12/17			
12/19	12/17			
12/26	12/26			
01/04	01/03			
01/06	01/05			
12/19	12/16			
12/19	12/15			
12/19	12/16			
12/19	12/17			
12/19	12/17			
12/19	12/17			
12/19	12/17			
12/19	12/17			
12/19	12/18			
12/19	12/18			
12/20	12/19			
12/21	12/20			
12/21	12/20			
12/21	12/20	SP ECOFLOW TECH DOVER DE	82711162355000002037866	4,705.86
12/21	12/21			
12/21	12/21			
12/22	12/21			
12/22	12/21			
12/22	12/21			
12/22	12/21			
12/23	12/22			
12/23	12/22			
12/23	12/22			
12/26	12/23			
12/26	12/24			
12/26	12/24			
12/26	12/24			
12/26	12/24			
12/26	12/24			
12/26	12/25			
12/26	12/25			
12/27	12/26			
12/27	12/26			

**Order No. EFUS-75060**

December 15, 2022

**Items ordered****EcoFlow****DELTA****Pro**

EcoFlow DELTA Pro Smart Extra

x 2

\$4,398.00

**Smart**

Battery

**Extra****Battery**

Subtotal

\$4,398.00

Miami Dade County Tax (1.0%)

\$43.98

Florida State Tax (6.0%)

\$263.88

**Total****\$4,705.86****Payment Info**

Mastercard (.....9722)

\$4,705.86

**Shipping Address**

CASEY GREEN

400 KINGS POINT DRIVE

230

SUNNY ISLES BEACH, FL 33160

United States

**Customer**

SUNSHINE INVESTMENT

3479 NE 163RD ST

115

NORTH MIAMI BEACH, FL 33160

United States

DBA SUNSHINE INVESTMENT COMPANY | Account # 9419 | December 1, 2022 to December 31, 2022

**Withdrawals and other debits - continued**

Date	Description	Amount
Card account # XXXX XXXX XXXX 0845		
12/01/22	CHECKCARD 1130 AMAZON.COM*XB5 SEATTLE WA CKCD 4816 XXXXXXXXXXXXX0845 XXXX XXXX XXXX 0845	-6,095.26
12/09/22		
12/12/22		
12/16/22		
12/16/22		
12/20/22		
12/27/22		
12/27/22		
Subtotal for card account # XXXX XXXX XXXX 0845		
Total withdrawals and other debits		

**Service fees**

The Monthly Fee on your primary Business Advantage Fundamentals Banking account was waived for the statement period ending 11/30/22. A check mark below indicates the requirement(s) you have met to qualify for the Monthly Fee waiver on the account.

- ☐ \$250+ in new net purchases on a linked Business debit card has not been met
- ☒ \$5,000+ combined average monthly balance in linked business accounts has been met
- ☒ Become a member of Preferred Rewards for Business has been met

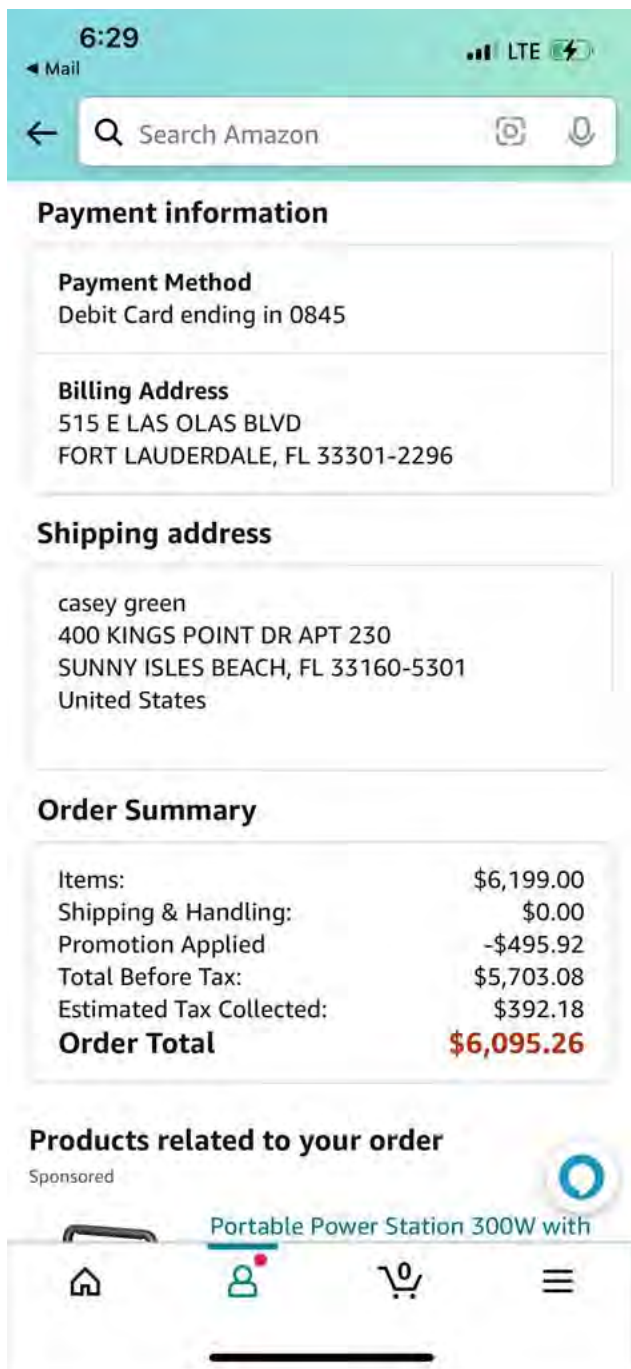
For information on how to open a new product, link an existing service to your account, or about Preferred Rewards for Business please call 1.888.BUSINESS or visit bankofamerica.com/smallbusiness.

Date	Transaction description	Amount
12/16/22	Prfd Rwd for Bus-ATM Wthdrwl Fee Waiver of \$2.50	-0.00
12/27/22	Prfd Rwd for Bus-ATM Wthdrwl Fee Waiver of \$2.50	-0.00
<b>Total service fees</b>		<b>-\$0.00</b>

Note your Ending Balance already reflects the subtraction of Service Fees.

**Daily ledger balances**

Date	Balance (\$)	Date	Balance (\$)	Date	Balance (\$)
12/01		12/16		12/23	
12/02		12/19		12/27	
12/08		12/20		12/28	
12/09		12/21		12/29	
12/12		12/22		12/30	



**APPLICATION FOR REGISTRATION OF FICTITIOUS NAME**

REGISTRATION# G19000070640

**Fictitious Name to be Registered:** SUNSHINE INVESTMENT COMPANY

**Mailing Address of Business:** 515 E LAS OLAS BLVD  
120  
FORT LAUDERDALE, FL 33301

**Florida County of Principal Place of Business:** MULTIPLE

**FEI Number:**

**Owner(s) of Fictitious Name:**

OLAJIDE, RONALD  
4200 PARK BLVD #137  
OAKLAND, CA 94602

**FILED**  
**Jun 24, 2019**  
**Secretary of State**

I the undersigned, being an owner in the above fictitious name, certify that the information indicated on this form is true and accurate. I further certify that the fictitious name to be registered has been advertised at least once in a newspaper as defined in Chapter 50, Florida Statutes, in the county where the principal place of business is located. I understand that the electronic signature below shall have the same legal effect as if made under oath and I am aware that false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s. 817.155, Florida Statutes.

RONALD OLAJIDE

06/24/2019

Electronic Signature(s)

Date

**Certificate of Status Requested ( )**

**Certified Copy Requested ( )**





**TOBYLINK IMPRESSIONS INC**  
 9411 COATSWORTH DRIVE  
 SUGAR LAND, TX 77498.USA  
 10111 CLODINE RD STE C, RICHMOND TX 77407  
 Phone: 832-341-0239  
 Fax: 281-201-4402  
 Cell: 508-344-4069  
 Email: olumartinsbus@aol.com  
 Website: www.tobylink.com

## Invoice

**Invoice No:** 20231025  
**Date:** 1/27/2023  
**Terms:** Net 00  
**Due Date:** 1/27/2023  
**Order No:** SOLAR PANEL  
**Territory:** TEXAS  
**Sales Person:** OLUSEUN OMOLE

**Bill To:**

CASEY GREEN  
 400 KINGS POINT DR  
 SUNNY ISLES BEACH, FL 33160  
 TEL: 786-233-9074

**Ship To:**

OLALEKAN OLAJIDE  
 IKOYI- LAGOS, NIGERIA  
 TEL: +234 903 147 9636

Ship Date	Ship Via	Tracking No	FOB
1/27/2023	SEA FREIGHT	DELIVERY : 8-9 WEEKS	IKOYI - LAGOS

Code	Description	Qty/Hours	Rate	Amount
	COST OF PICKUP FROM SUNNY ISLES BLEACH FLORIDA TO TOBYLINK 10111 CLODINE ROAD 2 PALLETS BOL #189095540	1.00	\$795.00	\$795.00*
	COST OF SEA FREIGHT, CUSTOM DUTY AND CLEARING FROM HOUSTON TEXAS TO LAGOS, NIGERIA - 10 BOXES 32 X 15 X 23 ECOFLOW SMART ETRA BATTERY	10.00	\$180.00	\$1,800.00*
	COST OF SEA FREIGHT, CUSTOM DUTY AND CLEARING FROM HOUSTON TEXAS TO LAGOS, NIGERIA - 5 BOXES 46 X 29 X 4 SOLAR PANELS 400W	5.00	\$150.00	\$750.00*
	COST OF SEA FREIGHT, CUSTOM DUTY AND CLEARING FROM HOUSTON TEXAS TO LAGOS, NIGERIA - 1 SMALL BOXES	1.00	\$150.00	\$150.00*
	COST OF SEA FREIGHT, CUSTOM DUTY AND CLEARING FROM HOUSTON TEXAS TO LAGOS, NIGERIA - 5 BOXES 46 X 29 X 4 SOLAR PANELS 400W	1.00	\$50.00	\$50.00*

\* Indicates non-taxable item

Thank you for your business and we hope you have a great day!

Subtotal	\$3,545.00
Discount	0.00%
Tax (8.25%)	\$0.00
Shipping	\$0.00
Total	\$3,545.00
Deposit	\$0.00
<b>Balance Due</b>	<b>\$3,545.00</b>

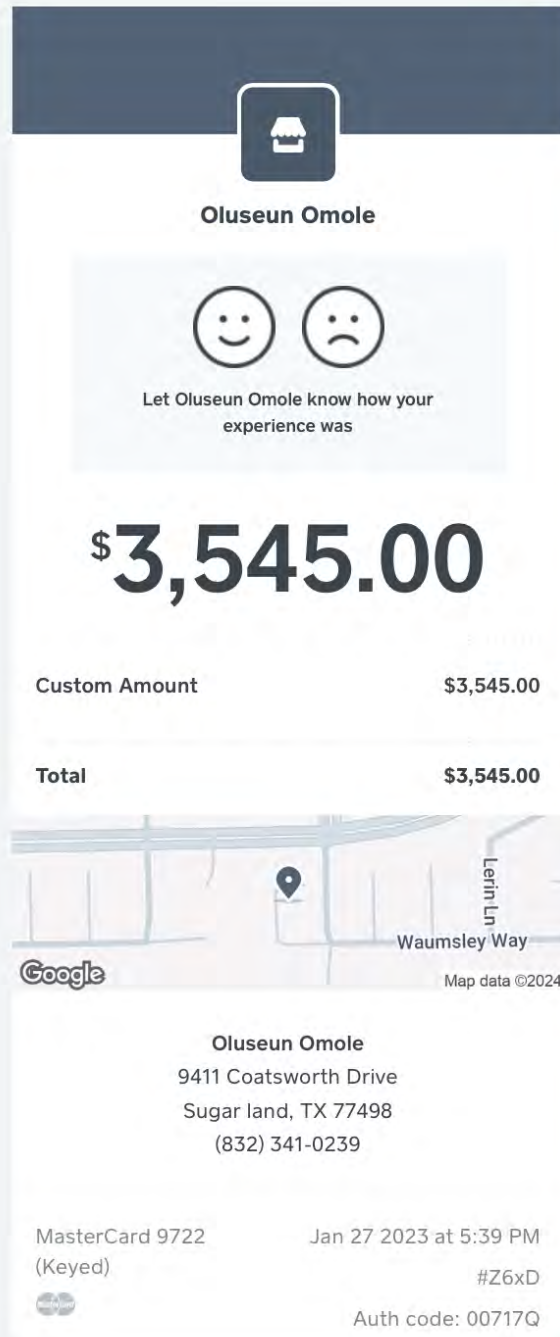
Page 1 of 1

**REMITTANCE ADVICE FOR Invoice # 20231025 on 1/27/2023**

Received From: CASEY GREEN  
 Balance Due: \$3,545.00  
 Amount Paid: \$

Please detach and send with remittance to:  
 TOBYLINK IMPRESSIONS INC  
 9411 COATSWORTH DRIVE  
 SUGAR LAND, TX 77498.USA  
 10111 CLODINE RD STE C, RICHMOND TX 77.















CLAIMS FOR RELIEF

**16. PRAYER**

**17.** WHEREFORE, Petitioner respectfully requests that this Court:

**18.** Set a virtual or telephonic hearing to adjudicate the superior property interest in FBI items 1B77 to 1B93.

**19.** Recognize Petitioner as a bona fide purchaser for value with a vested ownership interest in FBI items 1B77 to 1B93.

**20.** Order the immediate delivery of Petitioner's property as was originally paid for.

**21.** Grant such further relief as the Court deems just and proper.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on 12/27/2024

Petitioner's Signature



Ronald Olajide  
4200 Park Blvd Apt. 137  
Oakland, CA 94602  
510-629-0238  
Attorney for Plaintiff: Self-Represented